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Article number: 70001670000752392155

Mr. James Hooper
66 Feece Drive
Batavia, IL 60510



R00178630

RCRA RECORDS CENTER

RE: Univar, Buckingham Place, Omaha, Nebraska
EPA ID# NED986375327

Dear Mr. Hooper:

The Environmental Protection Agency (EPA) has reviewed the draft Corrective Measures Report dated November 2000 (CMS) and has the following comments:

1. Pages 4 and 5, Section 3.2.1

The CMS should explain the source(s) of hydraulic conductivity estimates for the various strata.

2. Pages 4 and 5, Section 3.2.1

The CMS should give the depth to groundwater, in feet below ground, and seasonal fluctuations in the water table.

3. Page 7, Section 3.2.3.1

a. In the first paragraph, provide an estimate of how many cubic yards of soil are impacted with pesticide contamination above clean up standards. Separate the estimate into how many yards are covered and not covered by concrete foundations.

b. In the second paragraph, provide an estimate of how many cubic yards of soil are impacted with VOC contamination above clean up standards in the upper five feet of loess. Separate the estimate into how many yards are covered and not covered by concrete foundations.

ARTD/RCAP:W.LOWE(7547);SCHMIDT(7843):3/14/01:CMS-COMT-LTR.WP

RCAP

RCAP

W.LOWE

J.SMITH

WLF
3/14/01

JS
3/15/01

4. Page 10, Section 3.4.2

VWR should explain the basis for eliminating pesticides from the list of COC's in groundwater.

5. Section 4.1

Details about VOC soil contamination are ignored in this section. Potential remediation of soils with high levels of VOC's has been screened out in Table 4 because of the excessive depth of the contamination. However there are very high levels of VOC's in some of the shallow soils (< 20 feet deep) and VWR should evaluate the treatment options for preventing these areas from acting as ongoing sources of contamination to groundwater as well as ensuring that future construction workers are protected from exposures. For deeper soils, VWR should also evaluate dual phase (water and soil-gas combination) extraction as a potential remedy that applies to VOC contamination in both media.

6. Page 15, Section 4.2.2, paragraph 3

This paragraph states that "to demonstrate containment, long-term monitoring data would need to show that the concentrations at MW4S and down gradient monitoring locations are stable or decreasing." As noted in Comments No. 11 and 12, below, it may not be possible to demonstrate this, depending on the time periods over which sampling data for various monitoring wells are reviewed. Because long-term groundwater monitoring is ultimately recommended by the CMS report, additional information to more clearly demonstrate the decrease in contaminant concentrations in monitoring wells' MW4S and MW7I needs to be provided.

7. Page 29, paragraph 2

This paragraph in reference to future groundwater monitoring mentions "... one well" located near Spring Lake Park. Regardless of the remedies finally selected, monitoring at Spring Lake Park will be included. The number of wells and/or springs that will be monitored has yet to be determined. This reference to "one well" must be removed from the report.

8. Appendix A, Section 3.0, Page 2

This section states that toxaphene was detected in subsurface soil samples collected as part of the CMS, and notes that toxaphene was not previously identified as a chemical of concern (COC) at the facility. The CMS report should be revised to address possible addition of this chemical to the COC list.

9. Appendix C, Figure 1

This figure presents hydro graphs for monitoring wells at the facility. The hydro graphs for most monitoring wells are similar, but those for monitoring wells MW4S and MS9S are quite different. However, there is no explanation for this difference, either on the figure or in the accompanying text. This information should be included in the report.

10. Appendices B, C, and D

References for citations in these appendices are not provided. Specifically, references need to be provided for citations on page 1 of Appendix B; pages 3, 6, 7, and 8 of Appendix C; and page 2 of Appendix D.

11. Appendix C, Section 3.2.1, Page 4, Paragraph 1

The last sentence of this paragraph states that Figure 2 shows an overall reduction in chlorinated volatile organic compounds (CVOC) concentrations in groundwater samples collected at the facility over time. However, Figure 2 in fact shows trends that are not clearly downward in all cases. The report needs to be expanded to discuss trend analysis in groundwater samples in more detail, to further support the assertion that CVOC concentrations are decreasing.

12. Appendix C, Section 3.2.1, Page 5, Paragraph 3

This paragraph states that CVOC concentrations in monitoring well MW4S have declined since 1997, and that concentrations in monitoring well MW7I have decreased since 1998. In fact, CVOC concentrations in all wells have fluctuated over time, decreasing at some times while increasing at others. For example, CVOC concentrations in monitoring well MW7I have actually increased since 1997, and have shown a clear upward trend in recent sampling, specifically since 1999. VWR must evaluate all available data as part of its trend analysis, and not select subsets of the data from specific periods of time. In particular, trends in all monitoring wells should be evaluated using the same data sets, and the text of the report should be revised to reflect this change.

13. After evaluating five remedial alternatives, Van Waters and Rogers, Inc. (VW&R), recommended constructing an engineered cover over the area of shallow pesticide-impacted soil. The Corrective Measures Study (CMS) only considered ex-situ chemical oxidation because “the low permeability observed in the impacted soil at the facility would make it difficult to deliver a chemical oxidant to the impacted soil.” However, the CMS also stated that “near surface soils (0-2 feet deep) were found to contain the highest pesticide concentrations.” In-situ chemical oxidation of near surface soil appears to be technically feasible. In addition, the CMS does not evaluate combining treatment alternatives that could reduce the risk further than is capable with a single alternative. For example, combining remedial alternatives like in-situ chemical oxidation of near surface soils then placement of an engineered cover over the treated area, could reduce the relative risk over the proposed cover only alternative. VW&R should revise the CMS to evaluate in-situ chemical oxidation of near surface soils and to evaluate combinations of remedial technologies for contaminated soil.

SPECIFIC COMMENTS on Appendix F:

1. Appendix F, Attachment A

The “Report of Findings” do not show the calculations used to determine the treatment efficiencies presented in Table 3.3 and 3.6. These calculations are necessary to corroborate the treatment efficiencies of Fenton’s reagent and KMnO_4 that are presented in Table 3.3 and 3.6. VW&R should revise Attachment A to include a spreadsheet that shows mass balance calculations that were used to determine the treatment efficiencies.

2. Appendix F, Attachment A

The analytical data that were used during the bench scale evaluation are included with the "Report of Findings." The soil analytical data does not indicate whether the results were presented on a wet or dry basis. How the data are reported could affect the mass balance results that are presented in Tables 3.3 and 3.6. VW&R should revise Attachment A to indicate whether the soil analytical data were provided on a wet or dry basis.

3. Appendix F, Attachment A

The "Report of Findings" did not indicate whether the liquid-phase portions of the samples were filtered prior to analysis. The manner in which the liquid-phase portion of the samples were processed prior to analysis could affect the mass balance results that are presented in Tables 3.3 and 3.6. VW&R should revise Attachment A to indicate whether the liquid-phase portion of the samples were processed prior to analysis.

4. Appendix F, Attachment A

The mass balance results are presented in Tables 3.3 and 3.6 of the "Report of Findings." A footnote at the bottom of each table stated that the treatment efficiencies were based on the quantity of contaminants of concern (COC) remaining in the control sample after treatment processing. It is unclear why VW&R chose to calculate the treatment efficiencies in this manner, since it would not account for the effect that processing had on the COCs concentrations. VW&R should revise Attachment A to explain the rationale for determining the treatment efficiencies based on the quantity of COCs in the control sample after processing and discuss whether treatment processing may have change the COCs concentrations.

5. Appendix F, Attachment A

The "Report of Findings" did not include an evaluation on whether CCS were completely mineralized during the oxidation reaction or whether by-products (such as dioxins) are formed during incomplete oxidation. The report also did not provide the chromatographs associated with the analytical data, which could be information on the completeness of the reaction. VW&R should revise Attachment A to evaluate whether the CCS were completely oxidized during the bench scale study in include the chromatographs to support that evaluation.

Pursuant to the Administrative Order on Consent, Univar has 30 days from receipt of this letter to revise and resubmit the CMS. If you have questions please call me at (913) 551-7547.

Sincerely,



William F. Lowe
Project Coordinator
RCAP
Air, RCRA, and Toxics Division

cc: Bill Gidley
Nebraska Department of Environmental Quality
Erik Tollefsruds
Geomatrix Consultants

bcc: David Hoefler
CNSL

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PRC

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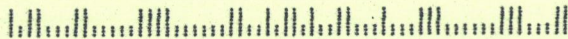


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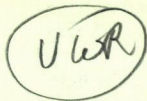


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